

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

IN RE:

CASE NO. 21-30107

PDG PRESTIGE, INC.,

CHAPTER 7

Debtor.

LEGALIST DIP GP, LLC,

Plaintiff,

v.

ADVERSARY NO. 23-03004

**PDG PRESTIGE, INC.
and MICHAEL DIXSON, individually,**

Defendants.

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE THAT the undersigned hereby appears as counsel to Legalist DIP GP, LLC (“**Legalist**”), plaintiff in the above-referenced adversary proceeding. Such counsel hereby enters his appearance under § 1109(b) of the United States Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and such counsel hereby requests, under Bankruptcy Rules 2002, 3017 and 9007 and §§ 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon them at the following:

M. Zachary Bluestone
Bluestone, P.C.
1717 K Street NW, Suite 900
Washington, DC 20006
Telephone: 202-655-2250
Facsimile: 202-792-6658
Email: mzb@bluestonelaw.com

PLEASE TAKE FURTHER NOTICE THAT, under § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, telecopy, email, or otherwise filed or made with regard to the referenced cases and proceedings herein with respect to (1) that affects or seeks to affect in any way, any rights or interests of any creditor or party of interest in this case, with respect to: a) the debtor; b) property of the estate, or proceeds thereof in which the alleged debtor may claim an interest; or c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by Legalist.

PLEASE TAKE FURTHER NOTICE THAT, neither this Notice of Appearance nor any former or later appearance, pleading, claim or suit will waive (1) Legalist's right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) Legalist's right to trial by jury in any proceeding in these cases or any case, controversy, or proceeding related to these cases, (3) Legalist's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, action, defenses, including defenses to jurisdiction, setoffs, or recoupment's to which Legalist may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Legalist expressly reserves.

Dated: January 5, 2024

Respectfully submitted,

BLUESTONE, P.C.

/s/ M. Zachary Bluestone

M. Zachary Bluestone

(admitted *pro hac vice*)

1717 K Street NW, Suite 900

Washington, DC 20006

Phone: 202-655-2250

Email: mzb@bluestonelaw.com

**COUNSEL TO
LEGLIST DIP GP, LLC**

CERTIFICATE OF SERVICE

I certify that on January 5, 2024, I served or caused to be served the foregoing document via the Court's Electronic Case Filing System.

/s/ M. Zachary Bluestone

M. Zachary Bluestone